

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD FOR
PUERTO RICO

CIVIL NO. 17-3283 (LTS)

AS A REPRESENTATIVE OF THE
COMMONWEALTH OF PUERTO RICO

TITLE III PROMESA

**URGENT MOTION REQUESTING EXTENSION OF TIME TO FILE A RESPONSE TO
THE MOTION FOR RELIEF OF STAY**

TO THE HONORABLE COURT:

COMES NOW the State Insurance Fund Corporation (hereinafter, “**SIFC**”), the Defendant in the matter of GARCÍA COLÓN V. STATE INSURANCE FUND CORPORATION, Civil No. 21-cv-01211 (RAM) before the United District Court for the District of Puerto Rico, through its undersigned counsel, and very respectfully alleges, requests, and prays:

1. On October 4, 2022, Keila García Colón (hereinafter, “**Movant**”) filed the MOTION FOR RELIEF FROM STAY (hereinafter, “**MOTION FOR RELIEF**”) [Docket No. 22501].
2. This Honorable Court set October 18, 2022, as the deadline for the SIFC to respond to said MOTION FOR RELIEF [Docket No. 22502].
3. Currently, the undersigned are in the process of preparing for trial. The trial is set to commence on October 26, 2022, and is scheduled to end on October 28, 2022, for Civ. Case Number 2018CV00967, at the Court of First Instance, Arecibo Region.
4. On October 12, 2022, the SIFC file a MOTION REQUESTING EXTENSION OF TIME, until November 4, 2022, to file a Response to the MOTION FOR RELIEF. [Docket No. 22586].

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5. On October 13, 2022, this Honorable Court *DENIED* the SIFC's motion requesting extension of time for failure to file pursuant to Case Management and Administrative Procedures (hereinafter, "**Case Management Order**") on Docket No. 20190. [Docket No. 22604].

6. In compliance with the Order issued on October 13, 2022, the undersigned in good-faith communicated on that same date with the Movant through their legal representation, attorney Juan R. González-Muñoz, requesting extension of time to answer the MOTION FOR RELIEF.

7. The Movant has expressed no objection to the request of extension of time given the circumstances. Her only petition is for the Court to allow the time for reply to be extended by the same amount of time granted in the original Order [Docket No. 22502], or until November 11, 2022.

8. Similarly, the SIFC exchanged email communications with the legal representatives of the Commonwealth, and they also expressed no objection to the time extension request.

9. In light of the above, the undersigned requests an extension of time, until November 4, 2022, to file a Response to the MOTION FOR RELIEF, as discussed with the Plaintiff and the representatives of the Commonwealth.

10. In pursuant to the Case Management Order [Docket No. 20190], the undersigned accompanies this Motion with a *Proposed Order*. *See* Exhibit 2 of this Motion.

11. The extension of time requested will not cause any undue delay or prejudice to the Plaintiffs.

12. Pursuant to Paragraph I.H of the Case Management Order [Docket No. 20190], the undersigned hereby certifies that after a thorough review there is a definite need for an urgent motion; this petition is made without the absence of due diligence, after righteous efforts and

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good faith communications with Movant's legal counsel and the representatives of the Commonwealth to resolve or narrow the issues that are being brought to the court.

WHEREFORE, it is respectfully requested that this Honorable Court take notice of the forgoing and grant until November 4, 2022, for the SIFC to file a Response to the MOTION FOR RELIEF; and grant allow the time for the Movant's reply to be extended by the same amount of time granted in the original Order or until November 11, 2022.

IT IS HEREBY CERTIFIED that the foregoing Motion for Extension of Time was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record participating in the same.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico, on October 17, 2022.

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